Bruce I. Afran Attorney-at-Law 10 Braeburn Drive Princeton, New Jersey 08540 609-924-2075

September 16, 2004

Jeff S. Jordan
Supervisory Attorney
Federal Election Commission
Complaints Examination & Legal Administration
999 E Street, NW
Washington, DC 20463

Re: MUR 5513

Dear Mr. Jordan:

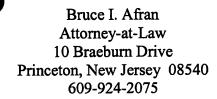
As counsel for Nader for President 2004, I have enclosed a reply to Complaint MUR 5513 for your review. As indicated, no violations have occurred and the Commission should not take further action on this matter.

Very truly yours,

Bruce J. afran
Bruce I. Afran

Attachments

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September 16, 2004

Jeff S. Jordan
Supervisory Attorney
Federal Election Commission
Complaints Examination & Legal Administration
999 E Street, NW
Washington, DC 20463

RE: MUR 5513

Dear Mr. Jordan:

The instant complaint concerns an accusation made through the news media that a third party, Norway Hill Associates, Inc. (Norway Hill), paid for circulators to gather signatures for petitions for Ralph Nader and Peter Camejo's ballot positions in New Hampshire.

These reports came principally from the Manchester Union Leader which reported on August 10, 2004 that Norway Hill had hired individuals to circulate Nader/Camejo nominating petitions.

As shown below, the complaint is incorrect and there have been no violations of election laws or regulations.

The Nader/Camejo campaign in New Hampshire accepted the services of an individual named David Carney to circulate petitions. Mr. Carney hired his own business, Norway Hill, of which he is a shareholder, to assist in gathering signatures for the petitions, as was reported in the Manchester Union-Leader. The campaign was unaware that Mr. Carney had hired Norway Hill because it had assumed Mr. Carney was a volunteer using his own time to assist the campaign.

After reading the article in the Union-Leader, the campaign promptly telephoned Mr. Carney to ask about the suggestion in the article that either he or his company had paid for individuals to circulate petitions. The campaign asked Mr. Carney to discuss the nature of these arrangements. Mr. Carney duly informed counsel and campaign manager Theresa Amato that he hired Norway Hill Associates to gather petitions for the Nader/Camejo campaign in New Hampshire.

In the conversation, the undersigned counsel told Mr. Carney that the campaign must be informed about all payments made by Mr. Carney or others on behalf of the New Hampshire petition drive and that such contributions, depending on the amount, could be a surplus contribution requiring reimbursement by the campaign.

Jeff S. Jordan September 16, 2004 Page 2

Mr. Carney agreed to document to the campaign all expenses that he paid and all costs charged by Norway Hill Associates. He stated that some bills were still outstanding and that he needed to wait until the final receipts were handed in before he could provide a report to the campaign. He complied on September 14, 2004 with a bill from Norway Hill Associates in connection with the petition drive and with a statement of all expenses that he, his wife Lauren Carney, and a third person, James McKay, paid to Norway Hill.

Mr. Carney, Mrs. Carney and Mr. McKay each paid two thousand dollars (\$2,000) to Norway Hill to cover its expenses in connection with the petition drive, as per the checks attached hereto. These payments were within the maximum contribution threshold of \$2,000 per person.

As set forth on the attached invoice dated September 14, 2004, Norway Hill's total bill for its canvassing services was Six Thousand, Two Hundred Sixty-Five Dollars and Five Cents (\$6,265.05), broken down as follows:

Signature Collection -- \$4,148.65 Postage -- 1,749.97 Printing -- 366.43

David Carney, James McKay and Lauren Carney each paid Norway \$2,000. toward this bill as an in-kind contribution to the Nader campaign, leaving a balance due of Two Hundred and Sixty-Five Dollars and Five Cents (\$265.05), which will be promptly paid by the campaign.

As for Mr. Carney, Mr. McKay and Mrs. Carney, they each made a \$2,000 in-kind contribution to the Nader/Camejo campaign; these individual contributions did not exceed the limits for a personal donation. As noted above, the balance of the vendor's bill will be paid by the campaign.

Consequently, there have been no violations of election laws or regulations and the Commission should take no further action on this complaint.

Respectfully submitted,

Bruce J. afran
Bruce I. Afran

Counsel for Nader for President 2004

10 Braeburn Drive

Princeton, New Jersey 08540

Attachments

FAX NO. :

Norway Hill Associates, Inc

INVOICE

DATE:

September 14, 2004

30 Norway HIII

Hancock, New Hampshire 03449

Phone 603.525,3820 Fax 603.525,3819

Bill To:

4412162

(C)

For

NH Petition Project

Nader for Presdient 2004 General Election Committee PO Box 18002 Washington DC 20036 202-265-0092

DESCRIPTION		AMOUNT
Signature Collection		\$4,148.65
Postage		\$1,749.97
Printing		\$366.43
		,
Credits		
David M. Carney - personal funds		(\$2,000)
James M. McKay - personal funds		(\$2,000)
Lauren Carney - personal funds		(\$2,000)
·		
	TOTAL	\$ 265.05

Make all checks payable to Norway Hill Associates, Inc If you have any questions concerning this invoice, contact N Lauren Careny at 603-525-3820,

NADER/CAMEJO 2004 Englosed is my contribution of:

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P.O. Box 18002, Washington, DC 20036 (202) 265-0092 fax | votenader.org

Enclosed is my contribution of:	
\$2,000\$1,000\$500\$250\$150\$100	\$50 other \$
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Name and home address are required for contributions of more than \$50.	· · · · · · · · · · · · · · · · · · ·
Address: 30 Norway Hill _city/State/	tip: Hancock, NH 03449
Work phone: 603. 525. 3818 Hame phone	e:
Fax: Email address:	
Federal law requires that we use our best efforts to collect and represent individual whose contributions exceed \$200 in a calendar year employed or unemployed. Employer: Norway Hill Associates Inc. Occupation Please add me to your email list Please.	r. Also indicate if retired, homemaker, student, self-
Method of Payment	ė.
Personal check or Money Order enclosed: made payable to "Nader fo	or President 2004" no corporate or business checks please
Cash (an individual may not contribute more than \$100 in cash during	the entire election cycle)
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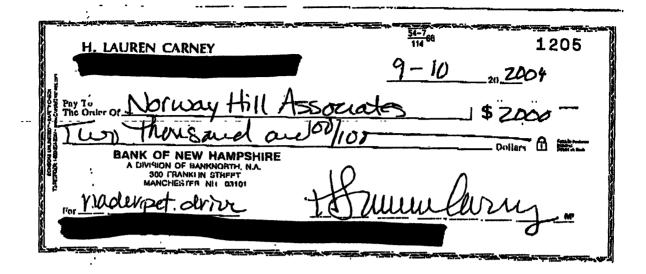
Contribution Guidelines

An individual may contribute a maximum of \$2,000 for the primary election and \$2000 for the general election, for a total of \$4000 per person. Joint contributions may be a total of \$4,000 for each of the elections, for a total of \$8000 per couple. If your contribution is more than the minimum for the primary election, the remaining amount will be redesignated to the general election. Federal Matching funds may double your contribution up to \$250 per person.

Nader for President 2004 does not accept contributions from any political action committee (PAC). Federal law prohibits contributions from corporations, labor organizations, National banks, federal contractors, and foreign nationals not admitted for permanent residence. Contributions must be from personal funds and not relimbursed by another person. Contributions are not tax deductible. For more information, contact contributions@votenader.org

Thanks for your contribution!

Paid for by Nader for President 2004



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FAX NO. :

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NADER/CAMEJO 2004

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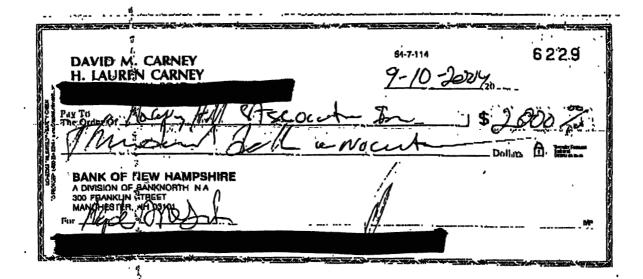
Name and home address are required for contributions of more than \$50 Name: Day & M. CARWEY Address: 30 Nowy Grant		
Name and home address are required for contributions of more than \$50 Name: David M. CARWEY Address: 20 Norway Hill City/State/Zip. Hgg.cotx NH 03 YY9 Nork phone. 603-565-3820 Home phone: FaxEmail address: Federal law requires that we use our best efforts to collect and report the name, address, occupation, and employer for each individual whose contributions exceed \$200 in a calendar year. Also indicate if retired, homemaker, student, self-employed or unemployed. Employer: Mowy Hill Account Occupation: CEO Please add me to your email list Please contact me about volunteering Method of Payment This Please contact me about volunteering Personal check or Money Order enclosed: made payable to "Nader for President 2004" – no corporate or business checks please Cash (an individual may not contribute more than \$100 in cash during the entire election cycle) Credit/Debit Card: Visa MasterCar. Discover American Express Diner's Club Credit Card Number Expiration Date. For credit card contributions: I am making this contribution on my own personal credit card and not with a corporate or business		
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Address: 30 Norway ft] City/State/Zip. #Go Co R Pot O3 999 Work phone. 603-545-3820	Contributor Information:	
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Signature Date:	Signature.	Date:

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Thanks for your contribution!



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NADER/CAMEJO 2004

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Enclosed is mỹ	contribution of:
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Address 7 7	eague Deive <u>city/State/Zip: Salem.</u> NH 03079
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